

a memory having program instructions; and

a processor configured to use the program instructions to receive a raw event at a network mediation service from an external computer network; to transmit said raw event to a message parsing service; to parse said raw event by said message parsing service; to transmit said parsed event to a event correlation service; to utilize data stored in a knowledge database to derive an event from said parsed event; and to transmit said derived event to one of a plurality of operator workstations, regardless of a significance of said derived event.

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#### **REMARKS**

This is in reply to the Examiner's Official Action dated February 13, 2003. Claims 1-33 are currently pending. By this Amendment, Applicants have amended the specification to correct a minor typographical error and claims 1, 16, 18, 28, 32 and 33 have been amended to more appropriately claim the invention. The above amendment with the following remarks is submitted to be fully responsive to the Official Action. Reconsideration of this application in light of these remarks, and allowance of this application are respectfully requested.

I. Preliminary Amendment

On August 17, 2000, Applicants filed a Preliminary Amendment in the present case to amend the title and update the specification with the related application information. The Examiner's Official Action dated February 13, 2003 failed to acknowledge receipt and consideration of that Preliminary Amendment. Applicants have therefore enclosed a copy of the Preliminary Amendment filed on August 17, 2000 with the Certificate of Mailing. Applicants respectfully request the Examiner acknowledge receipt and enter the Preliminary Amendment previously filed on August 17, 2000.

II. Rejection of Claims 1-12 Under 35 U.S.C. § 102(b)

On page 2 of the Official Action, the Examiner rejected claims 16, 17 and 32 under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 5,761,502 to Jacobs (hereinafter, Jacobs).

The present invention as recited in claim 16 is directed to a method for correlating network event messages on a computer network comprising a message parsing service, an event correlation service, and a knowledge database coupled together via a plurality of interfaces, said method comprising the steps of: receiving a raw event at said message parsing service; parsing said raw event by said message parsing service; transmitting said parsed event to said event correlation service; utilizing data stored in said knowledge database to derive an event from said parsed event; and transmitting said derived event to one of a plurality of operator workstations, regardless

of a significance of said derived event. Claim 32 recites an apparatus configured to perform the method recited in claim 16.

Anticipation under 35 U.S.C. §102(b) requires that each and every claim recitation be disclosed by the applied reference. Jacobs does not teach each and every claim recitation of claims 16 and 32, and therefore, as a matter of law, cannot anticipate these claims. That is, Jacobs does not teach a method comprising the steps of: receiving a raw event at said message parsing service; parsing said raw event by said message parsing service; transmitting said parsed event to said event correlation service; utilizing data stored in said knowledge database to derive an event from said parsed event; and transmitting said derived event to one of a plurality of operator workstations, regardless of a significance of said derived event. Jacobs also does not teach an apparatus (claim 32) capable of performing the steps recited above. A careful reading of Jacobs reveals that it does not teach, disclose or suggest at least a capability to transmit a derived event to one of a plurality of operator workstations, regardless of a significance of said derived event. In fact, Jacobs teaches away from this capability when it provides that:

If the state filter determines the state change is not significant, the process ends as indicated in a step 412, and the state change does not get reported or assessed. If the state filter determines the state change is significant, the process proceeds to a step 414, in which a notification message of the XYZ state change is generated.

(Jacobs at col. 12, lines 22-27.)

In other words, if a state change (derived event) is determined to be insignificant, it is not reported. Therefore, the rejection of independent claims 16 and 32 under 35 U.S.C. §102(b) as anticipated by Jacobs should be withdrawn. The rejection of dependent claim 17 should also be withdrawn as it includes allowable subject matter as recited in the independent claim from which it directly depends.

On page 4, the Examiner rejected claims 1-7, 18, 19, 22, 25, 28, 29 and 33 under 35 U.S.C. § 103(a) as unpatentable over Jacobs in view of U.S. Patent No. 5,721,825 to Lawson [et al.] (hereinafter, Lawson). According to the Examiner, Jacobs teaches "correlating network events across many different network domains but does not specify a network mediation service. However, Lawson teaches (column 4, lines 23-32; column 11, lines 37-56) globalizing event notifications in a distributed computing environment that includes [a] network mediation service (network connection 52 represents an example of the networking means for interconnect servers, Fig. 3)." (February 13, 2003 Official Action at page 5.) The Examiner later provides that "[s]ince both Jacobs and Lawson teaches event distribution across a network, it would have been obvious [if] the invention of Jacobs would also include [a] network mediation service in order for the network elements to communicate across different network domains." (Id.) Applicants disagree.

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the

reference or to combine reference teachings. Second, there must be some reasonable expectation of success. Finally, the prior art references must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in Applicant's disclosure.

In this case, the prior art references fail to teach or suggest all the claim elements. Specifically, the Examiner does not argue, nor does Jacobs or Lawson teach, suggest or disclose at least a capability to transmit said derived event to one of a plurality of operator workstations, regardless of a significance of said derived event, as recited in independent claims 1, 18 and 33. Jacobs and Lawson also do not teach the capability to transmit a parsed event to a network management service, regardless of a significance of said parsed event, as recited in independent claim 28. Therefore, the rejection of independent claims 1, 18, 28 and 33 under § 103(a) as unpatentable over Jacobs in view of Lawson is improper and should be withdrawn. The rejection of dependent claims 2-7, 19, 22 and 29 should also be withdrawn as they include allowable subject matter as recited in the respective independent claims from which they directly or indirectly depend.

The Examiner next rejected claims 8-15, 20, 21, 23, 24, 26, 27, 30 and 31 under 35 U.S.C. § 103(a) as unpatentable over Jacobs and Lawson, and further in view of U.S. Patent No. 6,477,585 to Cohen [et al.] (hereinafter, Cohen). The Examiner admits that Jacobs as modified (by Lawson) does not teach an event channel and he cites

Cohen for allegedly teaching this feature. Cohen does not at least disclose a capability to transmit a derived event to one of a plurality of operator workstations, regardless of a significance of said derived event as recited in independent claims 1, 18 and 33, nor does it disclose a capability to transmit a parsed event to a network management service, regardless of a significance of said parsed event, as recited in independent claim 28. Therefore, Cohen does not make up for the shortcomings of the Jacobs and Lawson combination. Claims 8-15, 20, 21, 23, 24, 26, 27, 30 and 31 depend directly or indirectly from claims 1, 18 and 28. Consequently, claims 8-15, 20, 21, 23, 24, 26, 27, 30 and 31 are patentable under § 103(a) over Jacobs, Lawson, and Cohen.

In view of the foregoing, it is submitted that the cited prior art considered separately or in combination fails to teach or suggest the Applicants' claimed invention. Therefore, it is respectfully asserted that the present application is in condition for allowance and a notice to that effect is respectfully requested. However, if the Examiner deems that any issue remains after considering this response, he is invited to call the undersigned to expedite the prosecution and work out any such issue by telephone.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 07-2339.

Respectfully submitted,

By: 

James K. Weixel  
Reg. No. 44,399

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Verizon Corporate Services Group Inc.  
600 Hidden Ridge, HQE03H01  
Irving, TX 75038  
(781) 466-2220

**APPENDIX TO AMENDMENT OF MAY 13, 2003**

**IN THE SPECIFICATION:**

Please amend the paragraph beginning on page 10, line 20 to read as follows:

Customer Level Services include a functionally complete set of services [set of services], which have value from a customer perspective. Integrated Services are packages combined from the Customers Level Services.

**IN THE CLAIMS:**

Please amend claims 1, 16, 18, 28, 32 and 33 as follows:

1. (Amended) A data processing apparatus for correlating network events among a number of client services comprising:

at least one computer comprising:

a memory having program instructions; and

a processor configured to use said program instructions to provide:

a network management service;

an event notification service;

a network mediation service adapted to:

receive a raw event from an external computer network; and

transmit said raw event to said event notification service;

a message parsing service adapted to:

receive a raw event from said event notification service;



parse said raw event; and  
transmit said parsed event to said event notification service;  
and  
an event correlation service coupled to a knowledge database  
comprising correlation knowledge, said event correlation service  
adapted to:  
receive said parsed event from said event notification  
service;  
utilize data stored in said knowledge database to derive an  
event from said parsed event; and  
transmit said derived event to one of a plurality of operator  
workstations via said event notification service, regardless of a significance of said  
derived event;  
wherein said network mediation, message parsing, event  
notification and network management services are coupled together via a plurality of  
interfaces.

16. (Amended) A method for correlating network event messages on a  
computer network comprising a message parsing service, an event correlation service,  
and a knowledge database coupled together via a plurality of interfaces, said method  
comprising the steps of:

receiving a raw event at said message parsing service;  
parsing said raw event by said message parsing service;  
transmitting said parsed event to said event correlation service;  
utilizing data stored in said knowledge database to derive an event from  
said parsed event; and  
transmitting said derived event to one of a plurality of operator  
workstations, regardless of a significance of said derived event.

18. (Amended) A method for correlating network event messages on a  
computer network comprising a network mediation service, a message parsing service,  
an event notification service, an event correlation service, and a knowledge database  
coupled together via a plurality of interfaces, said method comprising the steps of:

receiving a raw event at said network mediation service from an external  
computer network;  
transmitting said raw event to said message parsing service;  
parsing said raw event by said message parsing service;  
transmitting said parsed event to said event correlation service;  
utilizing data stored in said knowledge database to derive an event from  
said parsed event; and  
transmitting said derived event to one of a plurality of operator  
workstations, regardless of a significance of said derived event.

28. (Amended) A method for correlating network event messages on a computer network comprising a network mediation service, a message parsing service, an event notification service, and a network management service coupled together via a plurality of interfaces, said method comprising the steps of:

receiving a raw event at said network mediation service from an external computer network;

transmitting said raw event to said message parsing service;

parsing said raw event by said message parsing service;

transmitting said parsed event to said network management service,  
regardless of a significance of said parsed event.

32. (Amended) A data processing apparatus for correlating network events among a number of client services comprising:

means for receiving a raw event at a message parsing service;

means for parsing said raw event by said message parsing service;

means for transmitting said parsed event to an event correlation service;

means for utilizing data stored in a knowledge database to derive an event from said parsed event; and

means for transmitting said derived event to one of a plurality of operator workstations, regardless of a significance of said derived event.

33. (Amended) A computer system for correlating network events among a number of client services comprising:

- a memory having program instructions; and
- a processor configured to use the program instructions to receive a raw event at a network mediation service from an external computer network; to transmit said raw event to a message parsing service; to parse said raw event by said message parsing service; to transmit said parsed event to a event correlation service; to utilize data stored in a knowledge database to derive an event from said parsed event; and to transmit said derived event to one of a plurality of operator workstations, regardless of a significance of said derived event.